

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

CONSUMER FINANCIAL PROTECTION BUREAU,
et al.,

v. Plaintiffs,
Case No. 24-cv-00040-EAW-MJR

STRATFS, LLC (f/k/a STRATEGIC FINANCIAL
SOLUTIONS, LLC), et al.,

Defendants,

and

DANIEL BLUMKIN, et al.,

Relief Defendants.

**NOTICE OF EMERGENCY MOTION FOR THE RELEASE
OF FUNDS TO PAY PRE-RECEIVERSHIP PAYROLL
EXPENSES**

Moving Party: Receiver Thomas W. McNamara.

Nature of Action: Consumer Fraud.

Directed To: Receivership Defendants and Plaintiffs.

Date and Time: As soon as practicable.

Place: Robert H. Jackson United States Courthouse, 2 Niagara Square, Buffalo, New York 14202.

Supporting Papers: Declaration of Thomas W. McNamara, Esq. dated January 25, 2024.

Answering Papers: To be filed on schedule as determined by the Court. The Receiver intends to file a reply.

Relief Requested:

An Order authorizing the Receiver to disburse funds from the Receivership estate in the approximate aggregate amount of approximately \$700,000 (plus amounts to pay federal and state taxes) to pay certain pre-Receivership payroll expenses.

Grounds for Relief:

Paragraph IX.J of this Court's *Ex Parte* Temporary Restraining Order with an Asset Freeze, Appointment of a Receiver, and Other Equitable Relief, dated January 11, 2024.

Oral Argument:

Waived, unless requested by Defendants.

Dated: January 25, 2024

HODGSON RUSS LLP
Local Counsel for Receiver

By: /s/ James C. Thoman
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